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**Via ECF**

Hon. Michael A. Hammer, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
Courtroom MLK 2C  
50 Walnut Street  
Newark, NJ 07101

**Re: Niemczyk v. Pro Custom Solar LLC**  
**Docket No. 2:19-cv-7846-ES-MAH**

**Walters, et al. v. Pro Custom Solar LLC**  
**Docket No. 2:22-cv-0247-ES-MAH**

Dear Judge Hammer:

We represent the Plaintiffs in the above consolidated actions. As the Parties advised on the status call with the Court last week, the Parties continue to meet and confer on alleged deficiencies in Defendant's discovery responses in the *Walters* action. This morning, Defendant advised that it will be amending its discovery responses to address the issues raised by Plaintiffs and that it expects to provide those finalized discovery responses by the end of this week. Accordingly, the Parties respectfully request that the August 31, 2022 deadline to raise any remaining disputes with the Court be extended to September 30, 2022.

Respectfully submitted,

*/s/ Matthew R. Mendelsohn*

MATTHEW R. MENDELSON

cc: All Counsel (via ECF)

*The deadline to raise discovery disputes in  
Walters v. Pro Custom Solar is extended until  
9/30/2022.*

**SO ORDERED**

*s/Michael A. Hammer*  
**Michael A. Hammer, U.S.M.J.**

Date: *8/30/2022*